



# Oregon

John A. Kitzhaber, M.D., Governor

## Department of Environmental Quality

Northwest Region  
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July 2, 2001

Drew Gilpin  
Manager Environmental Services  
Oregon Steel Mills, Inc.  
P.O. Box 2760  
Portland, Oregon 97208

**Re: Project Schedule and Document Submittals  
Oregon Steel Mills, Inc.  
Portland, Oregon  
ECSI Site 141**

Dear Mr. Gilpin:

Thank you for submitting the Oregon Steel Mills' Summer and Fall 2001 environmental cleanup project activities schedule. This letter clarifies the proposed document submittals for the OSM site that was discussed with Ms. Laura McWilliams of Exponent over the phone last week, and proposes a revised schedule. In the phone conversation it was decided that OSM would submit a Pre-Remedial Investigation (RI) Summary report that is a modification of the Historical Investigation Report, yet includes addressing the DEQ comments presented in the May 30, 2001 DEQ letter. This document will be a Preliminary Assessment (PA) equivalent document that summarizes and evaluates the currently available site data. This will break the PA information summary from the RI Proposal document.

### DOCUMENT SUBMITTALS

The Pre-RI summary report should include:

- 1) PA equivalent information
- 2) Responses to the specific and general comments presented in the DEQ Comment letter
- 3) September 2001 field investigation data
- 4) Comparison of available and historic data to appropriate human and ecological risk-based screening values
- 5) A reference to the initial Pre-RI Field Activities Data report (dated February 2001)
- 6) Any other information OSM feels is pertinent to the understanding of the site.

The RI Proposal will focus on clearly identifying specific areas of concern (AOC) and compounds of interest within each operable unit; propose strategies for investigation of potential source areas; and proposed methods to define the nature and extent of the either individual AOCs, or groups of AOC, as seen applicable.



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## SCHEDULE

DEQ requests that OSM expedite the implementation of the Pre-RI activities. Additional Pre-RI sampling activities should be presented in a brief letter work plan, (perhaps as an addendum to the existing work plan). This letter work plan should be submitted to DEQ by July 24, 2001. DEQ requests the following revised schedule for project activities:

- July 24, 2001            Pre-RI Field Work - Phase II Letter Work Plan
- August 1, 2001        DEQ Review
- August 2001            Pre-RI Field Work - Phase II
- September 6, 2001    Pre-RI Summary Report Outline with list of Tables, Figures, and Appendixes
- October 5, 2001        Pre-RI Summary Report
- November 5, 2001     RI Proposal
- December 5, 2001    DEQ review of the RI Proposal
- January 21, 2002      RI Work Plan

I recommend that several working sessions, either by phone or quick meetings, be conducted to minimize additional report comments. The work sessions include discussions and review of: 1) draft versions of the completed hazardous substances table (leading into the COI and identification of all potential sources list), 2) conceptual site exposure model, 3) conceptual hydrogeologic model, 4) historical data evaluations, and 5) draft list of COIs for the operable units. Close communication when constructing the Pre-RI Summary Report and the RI Proposal will help ensure the report meets the requirements for the public record, and minimize additional letter comments.

I look forward to working with OSM and Exponent as we move forward with this project. If you have any questions or concerns, please contact me at 503-229-6915 or email me at [brodyheine.bruce@deq.state.or.us](mailto:brodyheine.bruce@deq.state.or.us).

Sincerely,



Bruce Brody-Heine  
Project Manager  
Voluntary Cleanup and Portland Harbor Section

cc:    David Livermore/Exponent  
       Laura McWilliams/Exponent  
       Rodney Struck/ DEQ - NWR  
       ESCI File No. 141